

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

DOWNEAST BUILDERS)	
& REALTY,)	
)	
Plaintiff,)	
)	
v.)	
)	
)	
ESSEX HOMES SOUTHEAST,)	
INC., <i>ET AL.</i> ,)	CASE NO. 3:11-cv-02653-CMC
)	
Defendants,)	
)	Jury Trial Demanded
v.)	
)	
)	
FRANK DOWNEY, and)	
CATHERINE M. DOWNEY,)	
)	
Counterclaim Defendants.)	

NOTICE OF REQUEST FOR PROTECTION

I respectfully request that the Court provide me with protection from appearing in the above-captioned case from November 19 - 27, 2012. Non-refundable airline tickets have been purchased for a Thanksgiving trip to visit grandchildren in Seattle during this holiday time frame. The Court's favorable consideration in this matter is greatly appreciated.

Dated: October 14, 2012

Respectfully submitted,

/s/ Robert M. Ward

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*One of the Attorneys for Essex Homes
Southeast, Inc. and Essex Homes
Southeast NC, Inc.*

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing was filed on the date set forth hereon electronically via CM/ECF in the United States District Court for the District of South Carolina, with notice and copy of same being electronically served by the Court upon all counsel of record.

/s/ Robert M. Ward